

Davis-BesseNPEm Resource

From: CuadradoDeJesus, Samuel
Sent: Tuesday, September 20, 2011 9:51 AM
To: dorts@firstenergycorp.com
Cc: Davis-BesseHearingFile Resource
Subject: Davis-Besse Draft RAI
Attachments: DBNPS AMR RAI TRP 40 Lube Oil 3.3.2.2.10.4-1 Kichline 9-12-11.docx

Steve:

Attached is a new Draft RAI I'll be adding to the RAI letter I'm working on. I'll be sending this one out this week. The final letter will have 3 RAIs.

Regards,

Samuel Cuadrado de Jesús

Project Manager

Projects Branch1

Division of License Renewal

U.S. Nuclear Regulatory Commission

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Hearing Identifier: Davis_BesseLicenseRenewal_Saf_NonPublic
Email Number: 1515

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0804FCD64F4)

Subject: Davis-Besse Draft RAI
Sent Date: 9/20/2011 9:51:09 AM
Received Date: 9/20/2011 9:51:11 AM
From: CuadradoDeJesus, Samuel

Created By: Samuel.CuadradoDeJesus@nrc.gov

Recipients:

"Davis-BesseHearingFile Resource" <Davis-BesseHearingFile.Resource@nrc.gov>
Tracking Status: None
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Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time	
MESSAGE	437	9/20/2011 9:51:11 AM	
DBNPS AMR RAI TRP 40 Lube Oil 3.3.2.2.10.4-1 Kichline 9-12-11.docx			34705

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

RAI 3.3.2.2.10.4-1

Background:

SRP-LR Table 3.3-1, item 26 ~~and~~ states that loss of material due to pitting and crevice corrosion could occur for copper alloy piping, piping components, and piping elements exposed to lubricating oil. The SRP-LR recommends GALL AMP XI.M39, "Lubricating Oil Analysis," to manage the aging effect and further evaluation of a program to verify the effectiveness of the Lubricating Oil Analysis Program, such as XI.M32, "One-Time Inspection," because control of contaminants within the lubricating oil may not have always been adequate to preclude corrosion.

In LRA Tables 3.3.2-14, 3.3.2-18, 3.3.2-30, 3.4.2-1, and 3.4.2-4, the applicant referenced LRA Table 3.3.1, item 3.3.1-26 and generic note I for copper alloy components exposed to fuel oil and stated that the components have no aging effects requiring management. For these items, the applicant further cited plant-specific notes which state that the components are made of copper alloy with less than 15 percent zinc and are not in contact with a more cathodic metal; therefore, the components have no aging effects requiring management.

Issue:

It is unclear to the staff why the applicant claims that copper alloy with less than 15 percent zinc components exposed to lubricating oil have no aging effects requiring management. The staff noted that copper alloy with less than 15 percent zinc components are less susceptible to loss of material than other copper alloys, but that the presence of contaminants (e.g., water) in lubricating oil can create an environment conducive to loss of material, regardless of whether or not the component is in contact with a more cathodic metal.

Request:

Explain why copper alloy with less than 15 percent zinc components exposed to lubricating oil have no aging effects requiring management or provide an appropriate AMP to manage loss of material.